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Of Attorneys for Creditor Daehong Technew Corp

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In Re:

Deep Photonics Corporation,

Debtor.

Case No. 12-35626-tmb11

**DAEHONG TECHNEW CORP'S
OPPOSITION TO NLIGHT'S AND Kiest'S
SECOND MOTION TO DISMISS
CHAPTER 11 BANKRUPTCY CASE OR, IN
THE ALTERNATIVE, CONVERT
CHAPTER 11 BANKRUPTCY CASE TO
CHAPTER 7**

Daehong Technew Corp ("Daehong") opposes NLIGHT'S AND Kiest'S SECOND MOTION TO DISMISS CHAPTER 11 BANKRUPTCY CASE OR, IN THE ALTERNATIVE, CONVERT CHAPTER 11 BANKRUPTCY CASE TO CHAPTER 7, or, more accurately, their renewed motion to dismiss or convert this proceeding.

Although the earlier version of this motion was denied without prejudice some change in circumstances other than the filing of a proposed plan and disclosure ought to transpire before renewing a motion. The proponents in their letter dated July 22, 2013 concerning scheduling of the consideration of the subject motion suggest that they have no new evidence to present. Proponents believe that the debtor is not capable of engaging in business and in confirming a plan and have so believed since the case began. This is not unusual in cases as acrimonious as

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this. Judicial efficiency and respect for the procedures prescribed in the Code mandate that such disagreements be taken up at the proper time and in the proper context which is clearly a confirmation hearing. There may be cases in which confirmation is so improbable that the process is appropriately truncated. This is not one of those cases. The debtor has proposed a plausible business plan and a confirmable plan of reorganization. Daehong respectfully requests that the process defined by Congress be followed.

DATED this 23rd day of July, 2013.

DAVIS WRIGHT TREMAINE LLP

By /s/ James C. Waggoner
James C. Waggoner, OSB #743307

Of Attorneys for Daehong Technew Corp.

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **DAEHONG TECHNEW'S OPPOSITION TO NLIGHT'S AND Kiest's SECOND MOTION TO DISMISS CHAPTER 11 BANKRUPTCY CASE OR, IN THE ALTERNATIVE, CONVERT CHAPTER 11 BANKRUPTCY CASE TO CHAPTER 7**, on the parties indicated as "ECF" on the attached List of Interested Parties by electronic means through the Court's Case Management/Electronic Case File system on the date set forth below.

In addition, I served the foregoing on the parties indicated as "Non-ECF" on the attached List of Interested Parties by mailing a copy thereof in a sealed, first-class postage prepaid envelope, addressed to each party's last-known address and depositing in the U.S. mail at Portland, Oregon on the date set forth below.

DATED this 23rd day of July, 2013.

DAVIS WRIGHT TREMAINE LLP

By /s/ James C. Waggoner
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INTERESTED LIST OF PARTIES

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